

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

ALBERT FORD,

Plaintiff,

v.

JAMES BENDER, et al.

Defendants.

Civil Action No. 07-11457-JLT

**PLAINTIFF ALBERT FORD'S ASSENTED TO MOTION FOR EXTENSION OF TIME  
TO RESPOND TO DOC DEFENDANTS' PENDING MOTIONS**

Plaintiff Albert Ford respectfully requests that the Court grant him through and until July 3, 2008, in which to file responses to the Department of Correction "DOC") Defendants' Motion to Dismiss, or in the Alternative, for Summary Judgment (Docket No. 31) and the DOC Defendants' Motion to Stay Discovery (Docket No. 35). In support of the requested extension, Plaintiff Ford states as follows:

1. On May 6, 2008, the Court issued an Order on Motions staying the DOC Defendants' motions pending efforts to locate counsel to represent Mr. Ford.
2. On May 20, 2008, Wilmer Cutler Pickering Hale & Dorr LLP filed notices of appearance, accepting appointment as pro bono counsel for Plaintiff Ford.
3. Given their recent appointment, undersigned counsel require additional time in which to investigate the factual and legal issues involved in this case and to prepare responses to the DOC Defendants' Motions.
4. Counsel for the DOC Defendants has assented to this motion for an extension of time.

WHEREFORE, for the reasons stated above, Plaintiff Ford respectfully requests that the Court allow him until July 3, 2008 to respond to the DOC Defendants' Motion to Dismiss or for Summary Judgment and Motion to Stay Discovery.

Respectfully submitted,  
ALBERT FORD

By his attorneys,

/s/ Michael D. Hoke  
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Michael D. Hoke, BBO # 670753  
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Dated: June 18, 2008

**CERTIFICATE PURSUANT TO LOCAL RULE 7.1(A)**

I hereby certify that I conferred with counsel for the DOC Defendants by phone on June 17, 2008, and with counsel for Defendant Bellotti by phone on June 18, 2008, and that counsel for the DOC Defendants and counsel for Defendant Bellotti assented to this Motion for Extension of Time to Respond to the DOC Defendants' Pending Motions until July 3, 2008.

/s/ Michael D. Hoke  
Michael D. Hoke, BBO # 670753

**CERTIFICATE OF SERVICE**

I, Michael D. Hoke, hereby certify that a true copy of the above document was served upon the attorney of record for each other party through the Court's electronic court filing (ECF) system, this 18<sup>th</sup> day of June, 2008.

/s/ Michael D. Hoke  
Michael D. Hoke, BBO # 670753